

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

**Case No.: 17-20014
Judge: BEH
Chapter: Chapter 13**

In Re: Anthony Jones

NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN

The Debtor, through Geraci Law, LLC, has filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, then on or before 21 days after service of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of factual and legal basis for the objection. File your written request at:

1. Clerk, U.S. Bankruptcy Court
517 East Wisconsin Avenue, Room 126
Milwaukee, WI 53202-4581

and provide copies to

United States Trustee
Eastern District of Wisconsin
517 East Wisconsin Avenue, Room 430
Milwaukee, WI 53202

Scott Lieske
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Geraci Law, LLC
Andrew Mark Golanowski
2505 N. Mayfair Rd. #101
Wauwatosa, WI 53226

Anthony Jones
320 N. 35th St.
Milwaukee, WI 53208

in time for its receipt by the above deadline. If you or your attorney do not take these steps, the Court may decide that you do not oppose the request and may enter an order modifying the Plan.

REQUEST TO MODIFY CHAPTER 13 PLAN

1. The Proponent of this modification is the Debtor.
2. This is a request to modify a Chapter 13 Plan:
 - a. ☐ post-confirmation
 - b. ☒ pre-confirmation
 - i. Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
 - ii. Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors affected are:
3. The Proponent wishes to modify the Chapter 13 Plan to do the following:
Increase the Chapter 13 Plan payment.
4. The reason(s) for the modification is/are: Account for an anticipated supplemental mortgage arrearage claim.
5. Select A or B:
 - A. ☐ The confirmed Chapter 13 Plan is modified as follows:
 - B. ☒ The unconfirmed Chapter 13 Plan is modified as follows: Debtor shall pay \$340 monthly for the remainder of the Chapter 13 Plan.

All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the even of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

6. **BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

CERTIFICATION

Complete one of the certifications below:

1. I/We, _____, the debtor(s) in this case, certify that I/we have reviewed the modification to the Chapter 13 plan proposed in this motion, and I/we authorize my/our attorney to file it with the court.

Debtor

Date

Debtor

Date

OR

2. I, Andrew Golanowski, attorney for the debtor(s), certify that I have reviewed the modification proposed above with the debtor(s), and that the debtor(s) has/have authorized me to file it with the court.

WHEREFORE, the Proponent requests that the court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Wednesday, June 28, 2017.

By: /s/ Andrew Mark Golanowski
Andrew Mark Golanowski
Attorney for Debtor
Bar #: 1055499

Andrew Mark Golanowski
Law Offices of Peter Francis Geraci
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (312) 332-1800
Fax: (877) 247-1960
Email: wag@geracilaw.com

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

**Case No.: 17-20014
Judge: BEH
Chapter: Chapter 13**

In Re: Anthony Jones

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Wednesday, June 28, 2017:

SEE ATTACHED LIST

Anthony Jones
320 N. 35th St.
Milwaukee, WI 53208

Additionally, the documents referenced above were also served via electronic means on the following individuals on Wednesday, June 28, 2017:

United States Trustee
Eastern District of Wisconsin
517 E. Wisconsin Ave.
Milwaukee, WI 53202

Scott Lieske
Chapter 13 Trustee
P.O. Box 510920
Milwaukee, WI 53203

Dated this Wednesday, June 28, 2017.

By: /s/ Andrew Mark Golanowski
Andrew Mark Golanowski
Attorney of the Debtor
Bar #: 1055499

Andrew Mark Golanowski
Law Offices of Peter Francis Geraci
2505 N. Mayfair Road, Suite 101
Wauwatosa, WI 53226
Phone: (312) 332-1800
Fax: (877) 247-1960
Email: wag@geracilaw.com

Label Matrix for local noticing
0757-2
Case 17-20014-beh
Eastern District of Wisconsin
Milwaukee
Wed Jun 28 10:01:09 CDT 2017

(p)AMERICOLLECT INC
PO BOX 2080
MANITOWOC WI 54221-2080

Chase Home Finance, LLC
Mail Code OH4-7302
3415 Vision Dr.
Columbus, OH 43219-6009

Experian
Attn: Bankruptcy Dept.
PO Box 2002
Allen, TX 75013-2002

MABT - Genesis Retail
Attn: Bankruptcy Dept.
Po Box 4499
Beaverton, OR 97076-4499

Office of the U. S. Trustee
517 East Wisconsin Ave.
Room 430
Milwaukee, WI 53202-4510

SLC Conduit I LLC
Bankruptcy Dept.
99 Garnsey Rd.
Pittsford, NY 14534-4565

TD BANK USA, N.A.
C O WEINSTEIN & RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

Transunion
Attn: Bankruptcy Dept.
PO Box 1000
Chester, PA 19022-1023

Wisconsin Dept. of Revenue
Special Procedures Unit
PO Box 8901
Madison, WI 53708-8901

Seterus, Inc. as the authorized subservicer
c/o O'Dess and Associates, S.C.
1414 Underwood Ave., Suite 403
Wauwatosa, WI 53213-2653

Aurora Health Care
Bankruptcy Dept.
PO Box 341700
Milwaukee, WI 53234-1700

Credit ONE BANK NA
Attn: Bankruptcy Dept.
Po Box 98875
Las Vegas, NV 89193-8875

IRS Priority Debt
Bankruptcy Dept.
PO Box 7346
Philadelphia, PA 19101-7346

Navient
Attn: Bankruptcy Dept.
Po Box 9500
Wilkes Barre, PA 18773-9500

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Seterus
Bankruptcy Dept.
P.O. Box 1077
Hartford, CT 06143-1077

TD BANK USA/Targetcred
Attn: Bankruptcy Dept.
Po Box 673
Minneapolis, MN 55440-0673

We Energies
Attn Bankruptcy Dept. RM A130
333 W Everett St
Milwaukee WI 53203-2803

Wisconsin Electric POW
Attn: Bankruptcy Dept.
231 W Michigan St # A130
Milwaukee, WI 53203-2918

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

(p)CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

Equifax
Attn: Bankruptcy Dept.
PO Box 740241
Atlanta, GA 30374-0241

LVNV Funding, LLC its successors and assigns
assignee of FNBK, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

Navient Solutions, Inc. on behalf of Educati
Credit Management Corporation
P.O. Box 16408
St. Paul, MN 55116-0408

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

Seterus, Inc.
PO Box 1047
Hartford, CT 06143-1047

Time Warner Cable
Bankruptcy Department
PO Box 511700
Milwaukee, WI 53203-0291

Wheaton Franciscan - St. Joseph
Bankruptcy Dept.
5000 W. Chambers St.
Milwaukee, WI 53210-1650